

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	MDL No. 02419
LITIGATION)	Docket No. 1:13-md-2419-RWZ
_____)	
)	
This document relates to:)	
)	
All Cases)	
)	

**NOTICE OF FILING OF BOX HILL DEFENDANTS' OBJECTIONS TO THE
PSC'S CROSS-EXAMINATION QUESTIONS FOR EACH DEPOSITION BY
WRITTEN QUESTION NOTICED BY BOX HILL**

Pursuant to Fed. R. Civ. P. 32(d)(3)(C), Defendants Box Hill Surgery Center, LLC, Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., LLC (collectively, "Box Hill Defendants"), give notice to the Court and to all parties of the filing of the following:

1. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Annapolis Surgery Center.¹
2. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Cumberland Valley Surgery Center.²
3. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of East Tennessee Children's Hospital.³
4. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Erlanger Health Systems.⁴
5. Box Hill Defendants' Objection to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Hunter Holmes McGuire VA Medical Center.⁵

¹ Exhibit 1.

² Exhibit 2.

³ Exhibit 3.

⁴ Exhibit 4.

⁵ Exhibit 5.

6. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of James E. Davis Ambulatory Surgical Center.⁶

7. Box Hill Defendants' Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Peninsula Orthopaedic Associates, P.A.⁷

8. Box Hill Defendant's Objections to the PSC's Rule 31 Cross-Examination Questions for the Deposition by Written Question of Premier Orthopedics & Sports Medicine.⁸

By operation of the Court's ECF system, the Box Hill Defendants consider their objections to the PSC's cross-examination questions appropriately served pursuant to Rule 32 and an agreed extension as of the filing of this Notice of Filing and associated exhibits, which include the Box Hill Defendants' objections as listed herein.

Respectfully submitted,

/s/ Gregory K. Kirby

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Attorneys for Box Hill Surgery Center, L.L.C., Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., L.L.C.

⁶ Exhibit 6.

⁷ Exhibit 7.

⁸ Exhibit 8.

CERTIFICATE OF SERVICE

I, Gregory K. Kirby, hereby certify that a copy of the foregoing Notice of Filing, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF), including the attorneys representing the plaintiffs in the individual cases, and will be sent to these parties by operation of the CM/ECF system, as well as sent to the deponents as identified in each Notice of Deposition.

Dated: February 19, 2016

/s/ Gregory K. Kirby